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Nov 17 7 01 AM '98

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FACSIMILE COVER SHEET

Date: November 16, 1998

Sender: David E. Frulla

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AT (202) 662-9700.

Recipient: Mr. Neil Evans

Fax No.: (202) 219-3496

MESSAGE

BRAND, LOWELL & RYAN

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

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November 16, 1998

VIA FACSIMILE AND HAND DELIVERED

Mr. Neil Evans
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Identification Number: C00004036
SEIU Committee on Political Education
July Monthly Report (6/1/98-6/30/98)

Dear Mr. Evans:

As you know, we represent the Service Employees International Union Committee on Political Education ("SEIU COPE"). On October 26, 1998, the SEIU COPE responded to your request for information regarding a transfer of funds from an affiliated local union political committee, the Local 1199 Political Action Fund. You have raised certain questions in response to the SEIU COPE's October 28 submission. We have investigated your concerns and attach hereto a letter, dated today, from counsel to the Local 1199 Political Action Fund. The attached letter addresses the questions you raised. Most pertinent, the letter from counsel for the Local 1199 Political Action Fund explains that the funds in question were check-off funds raised from Local 1199 members according to the limitations and prohibitions of the Federal Election Campaign Act, as amended.

Please do not hesitate to call if you have any questions or require additional information.

Sincerely,


David E. Frulla

Enclosure

RYAN, PHILLIPS, UTRECHT & MACKINNON*ATTORNEYS AT LAW
* Nonlawyer Partner818 CONNECTICUT AVENUE, N.W.
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WASHINGTON, D.C. 20008(202) 728-1010
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November 16, 1998

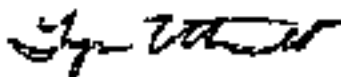
David Frulla, Esq.
Brand & Lowell
923 Fifteenth Street, N.W.
Washington, D.C. 20005

Dear Mr. Frulla:

This is to advise that funds transferred to SEIU from Local 1199 are all permissible federal contributions. Local 1199 maintains a federal account, a non-federal account and a collecting agent account. Prior to April 1998, funds from the collecting account were transferred to Local 1199's federal or non-federal accounts. In April 1998, Local 1199 became affiliated with SEIU. Thus on June 3, 1998, Local 1199 transferred a total of \$770,714 as a collecting agent to SEIU COPE. Since the funds were never deposited in Local 1199's federal account, Local 1199's federal account did not report these contributions. None of the contributions transferred to SEIU COPE met the threshold for itemization.

If you have any further questions, please let me know.

Sincerely,



Lyn Utrecht

Federal Election Commission

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